



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 26, 2014

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Smithville Telephone Company
Study Area Code 280467**

Dear Ms. Dortch:

On behalf of Smithville Telephone Company ("Smithville"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Smithville seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of the initial section 54.202(a) Five-Year Service Quality Improvement Plan and of outage reporting.³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 12-1857 rel. Nov. 16, 2012 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.202(a).



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June 26, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, WC Docket No. 11-42
2014 ETC Annual Report of Smithville Telephone Company
Study Area Code 280467
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Smithville Telephone Company (the "Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in attachments to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment are attachments to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission an initial section 54.202(a) Five-Year Service Quality Improvement Plan ("Five-Year Plan")⁴ and must also report outages, both of which are contained in attachments to the 2014 Report.
3. The information contained in attachments for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. The Company also seeks withholding from public inspection data pertaining to the Company's outages provided at FCC Form 481 Line 200 attachment, Service

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ See *In the Matter of Connect America Fund*, WC Docket No. 10-90, Order DA 14-591 (rel. May 1, 2014).

Outage Reporting. Information of this nature is confidential commercial information routinely withheld from public inspection.

4. With respect to identifying the degree to which the Five-Year Plan concerns a service that is subject to competition, the Line 112 attachment contains information of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment includes competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ Accordingly, because the Company is a rate-of-return carrier, it must file a five-year service improvement plan which contains proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

With respect to identifying the degree to which the outage data contained in the Line 200 attachment concerns a service that is subject to competition, the information pertains to the network and operations of a telecommunications company that has competitors that could benefit if they were able to have access to this information.

5. With respect to identifying possible exposure to competitive harm, the information contained in the subject attachments is information that is not customarily released to the public. The Five-Year Plan information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachments, the Company is filing the Five-Year Plan and outage attachments under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. The Commission has previously concluded that there is a presumptive likelihood of substantial competitive harm from disclosure of outage information.⁶ The Commission also determined the disclosure of outage reporting information to the public could present an unacceptable risk of more effective terrorist activity and could therefore result in potential harm to the public and the national defense.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment, and to the Company's outage data provided at FCC Form 481 Line 200 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

⁶ See *In the Matter of New Part 4 of the Commission's Rules Concerning Disruptions to Communications*, ET Docket No. 04-35, *Report and Order and Further Notice of Proposed Rulemaking*, FCC 04-188, rel. Aug. 19, 2004, para. 45.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

REDACTED FOR PUBLIC INSPECTION

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name: Person USAC should contact with questions about this data	Roger V. Thompson
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	rogert@traceroad.net

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
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<100>	Service Quality Improvement Reporting	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<200>	Outage Reporting (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<210>	<input type="text"/> <-- check box if no outages to report		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<300>	Unfulfilled Service Requests (voice)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<310>	Detail on Attempts (voice)	<div><div></div></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<320>	Unfulfilled Service Requests (broadband)	<input type="text" value="0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<330>	Detail on Attempts (broadband)	<div><div></div></div> (attach descriptive document)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<400>	Number of Complaints per 1,000 customers (voice)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<410>	Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<420>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<430>	Number of Complaints per 1,000 customers (broadband)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<440>	Fixed	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<450>	Mobile	<input type="text" value="0.0"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<510>	<div><div>280467ms510.pdf</div></div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<600>	Functionality in Emergency Situations	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<610>	<div><div>280467ms610.pdf</div></div> (attached descriptive document)		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<700>	Company Price Offerings (voice)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<800>	Operating Companies and Affiliates	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<900>	Tribal Land Offerings (Y/N)? <input type="radio"/> <input checked="" type="radio"/>	(if yes, complete attached worksheet)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1000>	Voice Services Rate Comparability	(check to indicate certification)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<1010>	<div><div></div></div> (attach descriptive document)		<input type="checkbox"/>	<input type="checkbox"/>
<1100>	Terrestrial Backhaul (Y/N)? <input checked="" type="radio"/> <input type="radio"/>	(if not, check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<1110>		(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	<input type="checkbox"/>	<input type="checkbox"/>
<2005>	(complete attached worksheet)	<input type="checkbox"/>	<input type="checkbox"/>

Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet

<3000>	(check to indicate certification)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<3005>	(complete attached worksheet)	<input checked="" type="checkbox"/>	<input type="checkbox"/>

(100) Service Quality Improvement Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	robert@traceroad.net

<110>	Has your company received its ETC certification from the FCC?	<input checked="" type="radio"/>	(yes / no)
<111>	If your answer to Line <110> is yes, do you have an existing "5 year plan" filed with the FCC?	<input type="radio"/>	(yes / no)

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.



Name of Attached Document

Please check these boxes below to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

<113>	Maps detailing progress towards meeting plan targets
<114>	Report how much universal service (USF) support was received
<115>	How (USF) was used to improve service quality
<116>	How (USF) was used to improve service coverage
<117>	How (USF) was used to improve service capacity
<118>	Provide an explanation of network improvement targets not met in the prior calendar year.

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(200) Service Outage Reporting (Voice)
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contract Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	robert@traceroad.net

[illegible]

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(700) Price Offerings including Voice Rate Data
Data Collection Form
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	robert@traceroad.net

1/1/2014
14.75

Residential Local Service Charge Effective Date	1/1/2014
Single State-wide Residential Local Service Charge	14.75

[illegible]

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext .
<039>	Contact Email Address - Email Address of person identified in data line <030>	rogett@traceroad.net

[illegible]

(800) Operating Companies
Data Collection Form
FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rogert@traceroad.net
<810>	Reporting Carrier	Smithville Telephone Company
<811>	Holding Company	
<812>	Operating Company	

[illegible]

(900) Tribal Lands Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	robert@traceroad.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

Select (Yes, No, NA)

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	
<035>	Contact Telephone Number - Number of person identified in data line <030>	
<039>	Contact Email Address - Email Address of person identified in data line <030>	

☐

Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)

☐

Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(G)

(1200) Terms and Condition for Lifeline Customers		FCC Form 481
Lifeline		OMB Control No. 3060-0986/OMB Control No. 3060-0819
Data Collection Form		July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	rogertr@traceroad.net

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>280467ms1210.pdf</div> <div>Name of Attached Document</div>
<1220>	Link to Public Website	HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	robert@traceroad.net

CHECK the boxes below to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b)(1), (c), (d), (e) the information reported on this form and in the documents attached below is accurate.

<2010>	Incremental Connect America Phase I reporting	
<2011>	2nd Year Certification {47 CFR § 54.313(b)(1)}	
<2012>	3rd Year Certification {47 CFR § 54.313(b)(2)}	
<2013>	Price Cap Carrier Receiving Frozen Support Certification {47 CFR § 54.312(a)}	
<2014>	2013 Frozen Support Certification	
<2015>	2014 Frozen Support Certification	
<2016>	2015 Frozen Support Certification	
<2017>	2016 and future Frozen Support Certification	
<2018>	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}	
<2019>	Certification Support Used to Build Broadband	
<2020>	Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2021>	3rd year Broadband Service Certification	
<2022>	5th year Broadband Service Certification	
<2023>	Interim Progress Certification	
<2024>	Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	

Name of Attached Document Listing Required Information

(3000) Rate Of Return Carrier Additional Documentation

Data Collection Form

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Rodger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	robert@taceroad.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3010)	Progress Report on 5 Year Plan Milestone Certification (47 CFR § 54.313(f)(1)(ii))	<div style="border: 1px solid black; width: 150px; height: 50px; margin: 0 auto;"></div>	Name of Attached Document Listing Required Information
(3011)	Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.	<input type="checkbox"/>	
(3012)	Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))	<div style="border: 1px solid black; width: 150px; height: 50px; margin: 0 auto;"></div>	Name of Attached Document Listing Required Information
(3013)	Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))	<input checked="" type="radio"/>	(Yes/No)
(3014)	If yes, does your company file the RUS annual report	<input checked="" type="radio"/>	(Yes/No)
Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input checked="" type="checkbox"/>	
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input checked="" type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	<div style="border: 1px solid black; width: 150px; height: 50px; margin: 0 auto;"></div>	Name of Attached Document Listing Required Information
(3018)	If the response is no on line 3014, Is your company audited?	<input type="radio"/>	(Yes/No)
(3019)	If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications	<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3021)	Management letter issued by the independent certified public accountant that performed the company's financial audit.	<input type="checkbox"/>	
(3022)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains: Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,	<input type="checkbox"/>	
(3023)	Underlying information subjected to a review by an independent certified public accountant	<input type="checkbox"/>	
(3024)	Underlying information subjected to an officer certification.	<input type="checkbox"/>	
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3026)	Attach the worksheet listing required information	<div style="border: 1px solid black; width: 150px; height: 50px; margin: 0 auto;"></div>	Name of Attached Document Listing Required Information

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	robert@traceroad.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: SMITHVILLE TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/25/2014
Printed name of Authorized Officer: Roger Thompson	
Title or position of Authorized Officer: President	
Telephone number of Authorized Officer: 6626514131 ext.	
Study Area Code of Reporting Carrier: 280467	Filing Due Date for this form: 07/01/2014
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	--

<010> Study Area Code	280467
<015> Study Area Name	SMITHVILLE TEL CO
<020> Program Year	2015
<030> Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035> Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	rogert@traceroad.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.</p>	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<p>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</p>	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
<p>I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.</p>	
Name of Reporting Carrier:	
Name of Authorized Agent or Employee of Agent:	
Signature of Authorized Agent or Employee of Agent:	Date:
Printed name of Authorized Agent or Employee of Agent:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
<p>Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.</p>	

Attachments

REDACTED – FOR PUBLIC INSPECTION

SMITHVILLE TELEPHONE COMPANY (SAC 280467)

ATTACHMENT - LINE 112

FIVE YEAR SERVICE QUALITY IMPROVEMENT PLAN

ATTACHMENT REDACTED IN ENTIRETY

(200) Service Outage Reporting (Voice)

Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	280467
<015>	Study Area Name	SMITHVILLE TEL CO
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Roger V. Thompson
<035>	Contact Telephone Number - Number of person identified in data line <030>	6626514131 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	robert@traceroad.net
<220>		

[illegible]

Smithville Telephone Company

Study Area Code: 280467

Response to Line 510 – Service Quality Standards and Consumer Protection Rule

Compliance for Voice and Broadband

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The Commission found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement” and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Smithville Telephone Company, Incorporated (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Mississippi Public Service Commission which disclose rates, terms, and conditions of service to customers; (2) adherence to state consumer protection requirements

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

governing telephone providers under Title 39 Utilities, Part III rules and Regulations Governing Public Utility Service, Subpart 1, General Rules, and Subpart 3, Special rules – Telephone Companies, including requirements for customer service, billing, consumer complaints, rates and charges, and slamming, under Mississippi Code Annotated Title 77, Chapter 3 statutes; (3) truth-in-billing requirements; and (4) CPNI rules, and (5) red flag rules and other applicable federal and state requirements governing the protection of customers’ privacy.

The Company is also subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3.

Smithville Telephone Company

Study Area Code: 280467

Response to Line 610 - Ability to Function in Emergency Situations

Smithville Telephone (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and in accordance with the orders in Mississippi Public Service Commission Docket No. 2005-AD-662. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations will also allow the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically in accordance with the orders in Mississippi Public Service Commission Docket No. 2005-AD-662, the Company has a reasonable amount of backup power to ensure functionality without an external power source, is able to reroute traffic and manage traffic spikes. In addition, the Company has comprehensive emergency operations plans in place and will adhere to the Federal Communications Commission’s reporting requirements regarding outages and provide copies of such reports to the Mississippi Commission upon request.

The Company’s standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

Smithville Telephone Company

Study Area Code: 280467

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service. The rates for other ancillary services not specifically shown below are presented in Smithville Telephone Company's tariff(s) on file with the Mississippi Public Service Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates:^{1 2}

Exchange Name	R-1 Rate
Smithville	\$14.75

¹ Above listed fees do not include mandatory taxes, fees and surcharges.

² Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

GENERAL SUBSCRIBER SERVICES TARIFF
SMITHVILLE TELEPHONE COMPANY, INC.
TC-003-0027-00

SECTION IV
6th Revised Sheet 16
Cancels 5th Revised Sheet 16

FILED 12-UN-0113

MAR 15 2012

SERVICE CONNECTION CHARGES

APPROVED

MISS. PUBLIC SERVICE
COMMISSION
PUBLIC UTILITIES STAFF

SERVICE CHARGES

APR 15 2012

LOW-INCOME ASSISTANCE PROGRAM

MISS. PUBLIC SERVICE
COMMISSION (T)
PUBLIC UTILITIES STAFF (T)

General

The Company, as part of its obligations as an Eligible Telecommunications Carrier, offers a low-income assistance program. This program, Lifeline Assistance, is offered under the terms and conditions provided below: (T)

Lifeline Assistance

A. General

Lifeline Assistance is a retail service offering available to qualifying low-income subscribers, as provided for below. Lifeline Assistance enables eligible subscribers to pay reduced charges for the following package of services: voice-grade access to the public switched network; local usage; dual-tone multi-frequency signaling or its functional equivalent; access to emergency services; access to operator services; access to interexchange service; access to directory assistance; and toll blocking. An eligible customer receives credit for the Low-Income Assistance Program pursuant to FCC Order 12-11 and pursuant to MPSC Docket 2007-AD-487. (T)

B. Regulations

1. Unless other eligibility requirements are established by the Commission, Lifeline Assistance is available to all residential subscribers who participate in one of the following programs:
 - a) Medicaid,
 - b) Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps, (T)
 - c) Supplemental Security Income (SSI),
 - d) Federal Public Housing Assistance (FPHA),
 - e) Low-Income Home Energy Assistance Program (LIHEAP),
 - f) Temporary Assistance to Needy Families (TANF),
 - g) National Free Lunch Program's Free Lunch Initiative (NFLP).

Income-Based Criteria:

Household gross monthly income that does not exceed 135% of the Federal Poverty Guidelines

2. Each subscriber to Lifeline Assistance must certify in writing to the Company, under penalty of perjury, that he/she receives benefits under a program outlined in sub-paragraph B.1., above, and must, on the same document, agree to notify the Company if he/she ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Company shall retain all such subscriber certifications pursuant to FCC Order 12-11 in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service administrators. (T)

Issue Date: 3/15/12
Effective Date: 4/15/12
Order Number:

Filed By: Roger V. Thompson, President
P. O. Box 117
Smithville, Mississippi 38870

GENERAL SUBSCRIBER SERVICES TARIFF
SMITHVILLE TELEPHONE COMPANY, INC.
TC-003-0027-00

SECTION IV
3rd Revised Sheet 16.1
Cancels 2nd Revised Sheet 16.1

FILED 12-UN-0113

MAR 15 2012

SERVICE CONNECTION CHARGES

APPROVED

MISS. PUBLIC SERVICE
COMMISSION
PUBLIC UTILITIES STAFF

SERVICE CHARGES

APR 15 2012

LOW-INCOME ASSISTANCE PROGRAM (Continued)

MISS. PUBLIC SERVICE (T)
COMMISSION
PUBLIC UTILITIES STAFF

Lifeline Assistance (Continued)

B. Regulations (Continued)

3. All applications for this service are subject to verifications with the state agency responsible for administration of the qualifying program. The Company may request any additional documentation deemed necessary prior to providing Lifeline benefits such as an administrating agency's official designation of eligibility in a particular means-based program sub-paragraph B.1., above, and that the telephone subscriber is the financially responsible party for the qualifying member of his or her household, or that the eligible household member is the telephone subscriber's dependent pursuant to the rules and regulations of the Internal Revenue Service. (D) (T)
4. The Company will reconcile and confirm eligibility periodically pursuant to FCC Order 12-11. At least annually an FCC-compliant random survey of a statistically valid number of the Lifeline subscribers which request that each surveyed subscriber verify under penalty of perjury that they, or a member of their household continue to participate in one of the means-based programs approved herein for eligibility by the Commission and/or survey at least annually the entire Lifeline subscriber base requesting that each surveyed subscriber verify under penalty of perjury that they, or a member of their household continue to participate in one of the means-based programs established by the Commission as eligible for lifeline funding. Lifeline subscribers who are subsequently determined to be ineligible shall be notified of their ineligibility in writing by the Company and provided 60 days from the date of such notice to rectify or otherwise demonstrate their eligibility prior to the discontinuance of their Lifeline benefits. All unresolved disputes regarding Lifeline eligibility shall be brought to the attention of the Commission for resolution. (T) (T)
- 5.
6. A subscriber may elect at the time of subscription to Lifeline Assistance to receive toll blocking as part of Lifeline Assistance at no charge. "Toll Blocking" is a service that allows a subscriber to elect not to allow the completion of outgoing toll calls from the subscriber's residence. Local service deposit requirements will be waived for customers who voluntarily receive Toll Limitation Service.

Issue Date: 3/15/12
Effective Date: 4/15/12
Order Number:

Filed By: Roger V. Thompson, President
P. O. Box 117
Smithville, Mississippi 38870

GENERAL SUBSCRIBER SERVICES TARIFF
SMITHVILLE TELEPHONE COMPANY, INC.
TC-003-0027-00

SECTION IV
1st Revised Sheet 16.1-A
Cancels Original Sheet 16.1-A

FILED 12-UN-0113

MAR 15 2012

SERVICE CONNECTION CHARGES

APPROVED

MISS. PUBLIC SERVICE
COMMISSION
PUBLIC UTILITIES STAFF

SERVICE CHARGES

APR 15 2012

LOW-INCOME ASSISTANCE PROGRAM (Continued)

MISS. PUBLIC SERVICE (T)
COMMISSION
PUBLIC UTILITIES STAFF

Lifeline Assistance (Continued)

B. Regulations (Continued)

7. Lifeline Assistance will not be disconnected for non-payment of toll charges, however, in the event toll charges are not paid within 10 days of the mailing of the Company bill, the Company will implement Toll Blocking immediately thereafter. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.
8. The Company may not collect a service deposit in order to initiate lifeline Assistance if the qualifying low-income subscriber voluntarily elects toll blocking from the Company, where available. If toll blocking is unavailable, then the Company may charge a service deposit.
9. (D)
(D)
10. Only one Lifeline service is available per residential household pursuant to FCC Order 12-11. A household is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. A household is not permitted to receive Lifeline benefits from multiple providers. (T)
11. A Lifeline customer may subscribe to any local service offering available to other residential customers.
12. The PIC charge will not be billed to Lifeline customers who subscribe to toll blocking and do not presubscribe to a long distance carrier.

Issue Date: 3/15/12
Effective Date: 4/15/12
Order Number:

Filed By: Roger V. Thompson, President
P. O. Box 117
Smithville, Mississippi 38870

GENERAL SUBSCRIBER SERVICES TARIFF

SMITHVILLE TELEPHONE COMPANY, INC.
TC-003-0027-00

SECTION IV
2nd Revised Sheet 16.2
Cancels 1st Revised Sheet 16.2

FILED

12-UN-0113

MAR 15 2012

SERVICE CONNECTION CHARGES

APPROVED

MISS. PUBLIC SERVICE
COMMISSION
PUBLIC UTILITIES STAFF

SERVICE CHARGES

APR 15 2012

LOW-INCOME ASSISTANCE PROGRAM (Continued)

MISS. PUBLIC SERVICE (T)
COMMISSION
PUBLIC UTILITIES STAFF

Lifeline Assistance (Continued)

C. Credits

1. The following credit* will apply for each customer eligible for Lifeline Assistance: (T)

Monthly Credit*

- a) Lifeline Credit ① \$ 9.25 (I) (C)
(D)
|
(D)

2. The Company shall apply the baseline payments received by the administrator of the Federal Lifeline Assistance program to the qualifying customer's basic local exchange service rate, pursuant to FCC Order 12-11 and MPSC Docket 2007-AD-487. (T)
|
(T)
3. Partial payments that are received from Lifeline customers shall first be applied to local service charges and then to any outstanding toll charges.

* Credit amount will not exceed the total of the basic Residential Local Exchange and Subscriber Line Charge rate. (T)
(D)
|

①Rates are in compliance with FCC Order 12-11 and are effective on dates determined by the FCC under Order 12-11. (D)
(N)
(N)

Issue Date: 3/15/12
Effective Date: 4/15/12
Order Number:

Filed By: Roger V. Thompson, President
P. O. Box 117
Smithville, Mississippi 38870

REDACTED – FOR PUBLIC INSPECTION

SMITHVILLE TELEPHONE COMPANY (SAC 280467)

ATTACHMENT - LINE 3017

ATTACHMENT REDACTED IN ENTIRETY